

Hess, Alana

From: Hess, Alana
Sent: Friday, November 30, 2018 10:29 AM
To: 'Langford, Mallory'
Cc: Wells, Jay; Henry, Tadd; Farmer, Kevin; Pinkerton, Blake
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Mallory,

Thank you for the additional information. Your extension is granted. I'll look for your comments on 12/31/18.

Thanks,

Alana L. Hess, P.E.
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102
(573) 526-0189

We'd like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the department's Customer Satisfaction Survey at <https://www.surveymonkey.com/r/MoDNRsurvey>. Thank you.

From: Langford, Mallory <mlangford@aeci.org>
Sent: Wednesday, November 28, 2018 3:12 PM
To: Hess, Alana <Alana.Hess@dnr.mo.gov>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>; Pinkerton, Blake <BPinkerton@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Alana,

Below are the answers to your questions that you sent on October 30th. Please let me know if you need additional clarification or have any more questions.

As mentioned in my November 19th email, we are still in the process of reviewing the draft permit and compiling our comments. We would like to extend the due date of our comments to December 31st. Please let us know if this is an issue.

1. Now that the landfill is in operation, is FE-03 Fly Ash Unloading to the Ash Ponds still an active emission source? I.e., does FE-03 need to remain in the permit?
New Madrid is placing fly ash in the lined ash pond under the beneficial reuse exception. Therefore, FE-03 will need to remain active for 2018RY and 2019RY EIQ purposes.
2. Does the installation use CyClean still? I.e., do the CyClean emission sources need to be included in the permit?
Construction permit number 122010-012 addresses the use of CyClean in the cyclone boilers. New Madrid Units 1 and 2 have a limit of 0.55 lb/MMBtu on a 30-day rolling average, along with an annual limit of 34,449 tons per year. The CyClean operation itself is not an emission source.

3. Questions regarding IA-04 (5) Glycol tanks and IA-18 Glycol Heater Vents:
- a. By Glycol do you mean Ethylene Glycol (107-21-1)? If not, ethylene glycol, would you please provide a CAS # or SDS for the glycol? This doesn't really have any permitting implications, I'm just trying to get accurate information for the PTE in the Statement of Basis.
The plant uses ethylene glycol (inhibited).
 - b. What is this glycol used for? This doesn't really have any permitting implications, I'm just trying to get accurate information for the installation/emission source description in the Statement of Basis.
The glycol is used to preheat combustion air in the boiler. It is also used to vaporize ammonia as part of the SCR process.
 - c. Is the heater electric or does it combust fuel? If it combusts fuel:
The glycol heaters are electric fans flowing across heater coils filled with warm glycol. There is no fuel combustion.
 - i. Please indicate the type and MHDR.
 - ii. Please explain why AECE believes this heater does or does not meet the MACT DDDDD definition of process heater.
4. Could you describe IA-20 Soot Blowing Air Compressor Vents in more detail? Please explain why AECE believes this emission source does or does not emit visible emissions.
The soot blowing air compressors are electric, and the vents are designed to allow compressed air to vent so the system does not over pressurize.
5. Please explain why AECE believes IA (2) 2.29 MMBtu/hr LPG-fired heaters and (2) 2 MMBtu/hr LPG-fired heaters do or do not meet the MACT DDDDD definition of process heater.
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6. Would you please submit your phenol emission factors for EP-01 and EP-02 that were used to determine EIQ emissions? I was able to locate a phenol emission factor in AP-42 of 1.6E-5 lb/ton; however, using it results in lower potential emissions than actual reported emissions in the 2017, 2016, 2015, 2014, and 2013 EIQs. I'm guessing that you all are using some type of site specific value. This doesn't have any permitting implications, I just want to provide an accurate phenol PTE in the statement of basis.
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Mallory Langford
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Springfield, MO 65807

(417) 371-5237 Office
(816) 787-7431 Cell
mlangford@aeci.org



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Would you please provide answers to the following additional questions I have about the installation by **November 14, 2018**?

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Attached is a mainly complete draft operating permit. Please review the draft and submit any questions/comments you may have by **November 14, 2018**.

Thanks,

Alana L. Hess, P.E.
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P.O. Box 176
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From: Hess, Alana
Sent: Friday, August 3, 2018 2:54 PM
To: 'Pinkerton, Blake' <BPinkerton@aeci.org>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Blake,

I am still working on New Madrid's operating permit. I wondered if you could answer a few questions for me:

1. For MATS does New Madrid use just one set of sorbent traps to demonstrate compliance with the applicable Hg emission limit? I.e. is New Madrid complying with §63.10000(c)(1)(vi)(A) or §63.10000(c)(1)(vi)(B)?
2. According to page SB-4 of Operating Permit OP2010-116B, the Barge River Pumps are used to pump cooling water during low river flow. How does New Madrid pump their cooling water during normal/high river flow?
3. MoEIS includes an EP-10 Internal Combustion Engines Industrial – Large Bore Engine Diesel Fuel Fired which is labelled as active for the installation; however, I cannot located this engine(s) anywhere in the previous operating permit or application. Please indicate if this is still an active emission source. If it is please provide the number of engines, size of each engine, and model year of each engine.
4. Please submit your Phase II NOx Compliance Plan (and Phase II NOx Averaging Plan if applicable) for Boilers 1 and 2.
5. Please submit a CAIR Permit application. Although rescinded on the federal level, the CAIR program remains in our State Implementation Plan (SIP); therefore, technically we still have to have a CAIR permit in the Part 70 as CAIR is technically still an applicable requirement. We are working on removing CAIR requirements from our SIP.

Please try to provide this information by August 20, 2018.

Thanks,

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From: Pinkerton, Blake <BPinkerton@aeci.org>
Sent: Monday, April 10, 2017 4:27 PM
To: Hess, Alana <Alana.Hess@dnr.mo.gov>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Ms. Hess,

Please see the responses to your questions below regarding our New Madrid Power Plant.

Please provide answers to the following questions:

1. Are the two 2.4 MMBtu/hr fuel oil heaters in No Construction Permit Required Determination 2016-01-004 (2016-01-004.pdf) EU0290 and EU0300 Tioga Heaters or are these different heaters? **The Tioga Heaters referenced as EU0290 and EU0300 are hard piped stationary units used at the crusher house. The units referenced in the No Construction Permit Required Determination are the same type/size, but skid mounted (portable) and rented for short term use during the winter months.**
2. No Construction Permit Required Determination 2012-06-072 states that you planned to use 14 275 HP barge pumps instead of EP-09 8 300 HP barge pumps and EP-13 2 345 HP barge pumps. Did this change occur? **The change did not occur. Still have the 8 as EP-09 and 2 as EP-13.**
3. How many acres are active at any given time in the landfill? **Each cell is 25 acres. Only 1 cell will be "active" at a time. Currently using Phase L- Cell 1, will switch to Phase III – Cell 2 when full.**
4. Construction Permit 092006-004 states that Boilers 1 and 2 have an MHDR of 7,150 MMBtu/hr, EPA's Air Markets Program indicates that Boiler 1 has an MHDR of 6,728 MMBtu/hr and Boiler 2 has an MHDR of 6,985 MMBtu/hr; however, the previous operating permit and your application state the MHDRs are only 6,340 MMBtu/hr. Please explain these discrepancies. EPA generally requires us to use the MHDR in the Air Markets Program unless sufficient justification can be provided for an increase/decrease in the MHDR... **I do not have the historical data on this but the higher number may have been used to represent the higher BTU Illinois coal before the switch to PRB. We are not opposed to using the numbers listed in the Air Markets Program but what would the implications be for using those numbers if it is found that the 6,340 MMBtu/hr is a better number?**
5. Would you please send me a copy of New Madrid's MATS initial NOC? **I have attached a copy to this email.**

From: Hess, Alana [<mailto:Alana.Hess@dnr.mo.gov>]

Sent: Wednesday, March 29, 2017 3:01 PM

To: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>

Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

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5. Would you please send me a copy of New Madrid's MATS initial NOC?

Alana L. Hess, PE

Environmental Engineer III

Missouri Department of Natural Resources

Phone: (573) 526-0189

Fax: (573) 751-2706

E-mail: alana.hess@dnr.mo.gov

Mailing Address:

Air Pollution Control Program – Permits Section

Attn: Alana Hess

P.O. Box 176

Jefferson City, MO 65102

From: Hess, Alana

Sent: Tuesday, March 28, 2017 10:41 AM

To: 'jwells@aeci.org'; thenry@aeci.org

Subject: 2015-04-093 New Madrid Power Plant (143-0004)

Mr. Wells,

My name is Alana Hess. I am an Environmental Engineer with the Missouri Department of Natural Resources' Air Pollution Control Program. I have been assigned to review the Part 70 operating permit renewal application, Project 2015-04-093, for New Madrid Power Plant (143-0004).

I may have questions for you throughout my review and drafting of the permit. Please respond to all questions within 15 days. An extension is available upon request.

I look forward to working with you.

Thanks,

Alana L. Hess, PE

Environmental Engineer III

Missouri Department of Natural Resources

Phone: (573) 526-0189

Fax: (573) 751-2706

E-mail: alana.hess@dnr.mo.gov

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Follow Up Flag: Follow up
Flag Status: Flagged

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1. Now that the landfill is in operation, is FE-03 Fly Ash Unloading to the Ash Ponds still an active emission source? I.e., does FE-03 need to remain in the permit?
2. Does the installation use CyClean still? I.e., do the CyClean emission sources need to be included in the permit?
3. Questions regarding IA-04 (5) Glycol tanks and IA-18 Glycol Heater Vents:
 - a. By Glycol do you mean Ethylene Glycol (107-21-1)? If not, ethylene glycol, would you please provide a CAS # or SDS for the glycol? This doesn't really have any permitting implications, I'm just trying to get accurate information for the PTE in the Statement of Basis.
 - b. What is this glycol used for? This doesn't really have any permitting implications, I'm just trying to get accurate information for the installation/emission source description in the Statement of Basis.
 - c. Is the heater electric or does it combust fuel? If it combusts fuel:
 - i. Please indicate the type and MHDR.

- ii. Please explain why AECl believes this heater does or does not meet the MACT DDDDD definition of process heater.
4. Could you describe IA-20 Soot Blowing Air Compressor Vents in more detail? Please explain why AECl believes this emission source does or does not emit visible emissions.
5. Please explain why AECl believes IA (2) 2.29 MMBtu/hr LPG-fired heaters and (2) 2 MMBtu/hr LPG-fired heaters do or do not meet the MACT DDDDD definition of process heater.
6. Would you please submit your phenol emission factors for EP-01 and EP-02 that were used to determine EIQ emissions? I was able to locate a phenol emission factor in AP-42 of 1.6E-5 lb/ton; however, using it results in lower potential emissions than actual reported emissions in the 2017, 2016, 2015, 2014, and 2013 EIQs. I'm guessing that you all are using some type of site specific value. This doesn't have any permitting implications, I just want to provide an accurate phenol PTE in the statement of basis.

Attached is a mainly complete draft operating permit. Please review the draft and submit any questions/comments you may have by **November 14, 2018**.

Thanks,

Alana L. Hess, P.E.
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102
(573) 526-0189

We'd like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the department's Customer Satisfaction Survey at https://secure-web.cisco.com/1xkfVR8PbsX-JkyGxZ6id1X3Ilyi5yMskhjlrzQR6dsAdXqwbwUWWCHQKIoioIlxXmJWZ1Y0G0ZqQTr_bjtWTPdL_Qe5jckVmlJwKpu-vPWzcWen7IArchLuifWm92FJIn99oUHBvjGclK5KGdkt8pZThUCH12Gb5awb3qRVI8b_WqsRfb_8INJpwYLOwmxrJrNOBPubnqcQEDcGSTVQw-FcdwLMsqW1aIJa1C4Z4qBTLEfx_dXmY9mOIT86wylj6cEKvam76fM1I0N8I62clq/https%3A%2F%2Fwww.surveymonkey.com%2Fr%2FMoDNRsurvey. Thank you.

From: Hess, Alana
Sent: Friday, August 3, 2018 2:54 PM
To: 'Pinkerton, Blake' <BPinkerton@aeci.org>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Blake,

I am still working on New Madrid's operating permit. I wondered if you could answer a few questions for me:

1. For MATS does New Madrid use just one set of sorbent traps to demonstrate compliance with the applicable Hg emission limit? I.e. is New Madrid complying with §63.10000(c)(1)(vi)(A) or §63.10000(c)(1)(vi)(B)?
2. According to page SB-4 of Operating Permit OP2010-116B, the Barge River Pumps are used to pump cooling water during low river flow. How does New Madrid pump their cooling water during normal/high river flow?
3. MoEIS includes an EP-10 Internal Combustion Engines Industrial – Large Bore Engine Diesel Fuel Fired which is labelled as active for the installation; however, I cannot located this engine(s) anywhere in the previous operating permit or application. Please indicate if this is still an active emission source. If it is please provide the number of engines, size of each engine, and model year of each engine.

4. Please submit your Phase II NOx Compliance Plan (and Phase II NOx Averaging Plan if applicable) for Boilers 1 and 2.
5. Please submit a CAIR Permit application. Although rescinded on the federal level, the CAIR program remains in our State Implementation Plan (SIP); therefore, technically we still have to have a CAIR permit in the Part 70 as CAIR is technically still an applicable requirement. We are working on removing CAIR requirements from our SIP.

Please try to provide this information by August 20, 2018.

Thanks,

Alana L. Hess, P.E.
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102
(573) 526-0189

We'd like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the department's Customer Satisfaction Survey at https://secure-web.cisco.com/1xkfVR8PbsX-JkyGxZ6id1X3llyi5yMskhjlrzQR6dsAdXqwbwUWWCHQKloioIlxXmJWZ1Y0G0ZqQTr_bjtWTPdL_Qe5jckVmlJwKpu-vPWzcWen7IArchLuifWm92FJIn99oUHBvjGclK5KGdkt8pZThUCh12Gb5awb3qRVI8b_WqsRfb_8INJpwYLOwmxrJrNOBPubnqcQEDcGSTVQw-FcdwLMsqW1a1Ja1C4Z4qBTLEfx_dXmY9mOIT86wylj6cEKvam76fM1I0N8l62clq/https%3A%2F%2Fwww.surveymonkey.com%2Fr%2FMoDNRsurvey. Thank you.

From: Pinkerton, Blake <BPinkerton@aeci.org>
Sent: Monday, April 10, 2017 4:27 PM
To: Hess, Alana <Alana.Hess@dnr.mo.gov>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Ms. Hess,

Please see the responses to your questions below regarding our New Madrid Power Plant.

Please provide answers to the following questions:

1. Are the two 2.4 MMBtu/hr fuel oil heaters in No Construction Permit Required Determination 2016-01-004 (2016-01-004.pdf) EU0290 and EU0300 Tioga Heaters or are these different heaters? **The Tioga Heaters referenced as EU0290 and EU0300 are hard piped stationary units used at the crusher house. The units referenced in the No Construction Permit Required Determination are the same type/size, but skid mounted (portable) and rented for short term use during the winter months.**
2. No Construction Permit Required Determination 2012-06-072 states that you planned to use 14 275 HP barge pumps instead of EP-09 8 300 HP barge pumps and EP-13 2 345 HP barge pumps. Did this change occur? **The change did not occur. Still have the 8 as EP-09 and 2 as EP-13.**
3. How many acres are active at any given time in the landfill? **Each cell is 25 acres. Only 1 cell will be "active" at a time. Currently using Phase L- Cell 1, will switch to Phase III – Cell 2 when full.**
4. Construction Permit 092006-004 states that Boilers 1 and 2 have an MHDR of 7,150 MMBtu/hr, EPA's Air Markets Program indicates that Boiler 1 has an MHDR of 6,728 MMBtu/hr and Boiler 2 has an MHDR of 6,985 MMBtu/hr; however, the previous operating permit and your application state the MHDRs are only 6,340 MMBtu/hr. Please

explain these discrepancies. EPA generally requires us to use the MHDR in the Air Markets Program unless sufficient justification can be provided for an increase/decrease in the MHDR... **I do not have the historical data on this but the higher number may have been used to represent the higher BTU Illinois coal before the switch to PRB. We are not opposed to using the numbers listed in the Air Markets Program but what would the implications be for using those numbers if it is found that the 6,340 MMBtu/hr is a better number?**

5. Would you please send me a copy of New Madrid's MATS initial NOC? **I have attached a copy to this email.**

From: Hess, Alana [<mailto:Alana.Hess@dnr.mo.gov>]

Sent: Wednesday, March 29, 2017 3:01 PM

To: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>

Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Mr. Wells,

Please provide answers to the following questions:

1. Are the two 2.4 MMBtu/hr fuel oil heaters in No Construction Permit Required Determination 2016-01-004 (2016-01-004.pdf) EU0290 and EU0300 Tioga Heaters or are these different heaters?
2. No Construction Permit Required Determination 2012-06-072 states that you planned to use 14 275 HP barge pumps instead of EP-09 8 300 HP barge pumps and EP-13 2 345 HP barge pumps. Did this change occur?
3. How many acres are active at any given time in the landfill?
4. Construction Permit 092006-004 states that Boilers 1 and 2 have an MHDR of 7,150 MMBtu/hr, EPA's Air Markets Program indicates that Boiler 1 has an MHDR of 6,728 MMBtu/hr and Boiler 2 has an MHDR of 6,985 MMBtu/hr; however, the previous operating permit and your application state the MHDRs are only 6,340 MMBtu/hr. Please explain these discrepancies. EPA generally requires us to use the MHDR in the Air Markets Program unless sufficient justification can be provided for an increase/decrease in the MHDR...
5. Would you please send me a copy of New Madrid's MATS initial NOC?

Alana L. Hess, PE

Environmental Engineer III

Missouri Department of Natural Resources

Phone: (573) 526-0189

Fax: (573) 751-2706

E-mail: alana.hess@dnr.mo.gov

Mailing Address:

Air Pollution Control Program – Permits Section

Attn: Alana Hess

P.O. Box 176

Jefferson City, MO 65102

From: Hess, Alana

Sent: Tuesday, March 28, 2017 10:41 AM

To: 'jwells@aeci.org'; thenry@aeci.org

Subject: 2015-04-093 New Madrid Power Plant (143-0004)

Mr. Wells,

My name is Alana Hess. I am an Environmental Engineer with the Missouri Department of Natural Resources' Air Pollution Control Program. I have been assigned to review the Part 70 operating permit renewal application, Project 2015-04-093, for New Madrid Power Plant (143-0004).

I may have questions for you throughout my review and drafting of the permit. Please respond to all questions within 15 days. An extension is available upon request.

I look forward to working with you.

Thanks,

Alana L. Hess, PE
Environmental Engineer III
Missouri Department of Natural Resources

Phone: (573) 526-0189
Fax: (573) 751-2706
E-mail: alana.hess@dnr.mo.gov

Mailing Address:
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